



Rhode Island Department of Children, Youth and Families Department Operating Procedure

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	Version #: 3	Revision History: January 18, 2022 V.1 August 3, 2023 V.2	Director:  Ashley Deckert
Section: General Administration		Title: Research Protections and Data Requests	
Legal Authority: <ul style="list-style-type: none"> • Rhode Island General Law §42-72-5 			
Related DOPs: <ul style="list-style-type: none"> • Confidentiality and Access to Departmental Information; DOP: 100.0000 			
Related Forms: <ul style="list-style-type: none"> • Consent Form • External Data Request Form • Internal Data Request Form 			

I. PURPOSE

The Department of Children, Youth and Families (the Department) authorizes research and the release of data involving persons served in accordance with R.I. Gen. Laws § 42-72-5. The Department has established clear procedures that protect the rights of individuals to decline participation without penalty and ensure the confidentiality of all participants. All research activities and data releases are conducted in compliance with applicable legal requirements.

II. PROCEDURE

A. Human Subjects Research Protections

1. Proposals for human subject research must be reviewed and approved by an Institutional Review Board (IRB).
2. Research participants, or their parent or legal guardian when applicable, must provide written informed consent. The Consent Form must confirm that participation is voluntary, explain the purpose of the research, describe potential risks or discomforts, and outline confidentiality protections.
3. When the Department distributes a formative survey to staff, foster parents, service providers, persons served, or other stakeholders for the purpose of improving practice or Department operations, IRB review is not required. However, the survey must include a clear statement of purpose and indicate whether responses are anonymous or identifiable. All surveys must be reviewed and approved by the DPI Administrator prior to distribution.

B. External Research and Data Requests

1. Any request from an outside entity or another state agency to conduct research or obtain data from the Department must be forwarded in writing to the

- Department of Performance Improvement (DPI) administrator, the contracts administrator, and the Department's chief executive counsel.
2. Requests must be reviewed and approved in writing by the DPI administrator, the contracts administrator, and the chief executive counsel before any data-sharing agreement or release of data.
 3. Additional information may be requested, or a meeting may be scheduled with Department staff and the external entity, before final approval.
 4. External entities requesting aggregate, non-identifiable data must complete the Department's Data Request Form, available at: dcyf.ri.gov.
 - a. The form is reviewed by the DPI administrator or designee and the MIS administrator.
 - b. A meeting may be scheduled to clarify questions before approval.
 - c. Approved data must apply the Department's confidentiality and small-numbers policy (cells of five or fewer suppressed, with additional rules applied as needed).
 - d. Timelines for fulfilling requests are determined by the complexity of the request and current workload.
 5. External entities requesting individual-level data must enter into a Data Sharing Agreement.
 - a. The Agreement is developed by the DCYF Contracts Division in consultation with DPI and Legal.
 - b. It includes the state boilerplate agreement and a DCYF-specific addendum outlining the data elements requested.
 - c. A meeting is scheduled among Contracts, DPI, Legal, and the external entity to finalize the agreement.
 - d. The Agreement must be approved by DPI, Contracts, and Legal, and signed by the DCYF Director or designee before data are shared.
- C. Internal Research and Data Requests
1. Requests from within the Department for data, research, or program evaluation must be submitted through the internal Data Request Form to DPI.
 2. DPI reviews the request, estimates the time required, and provides the data once approved.
 3. Staff intending to use data in a presentation or report must submit it to DPI for review before release.
 4. The Department's confidentiality and data suppression procedures apply to any summary data shared externally.
 5. Staff are encouraged to submit requests at least two weeks in advance. Actual timelines will vary based on the nature and complexity of the request.
- D. Use of Data in Reporting
1. External Reports
 - a. Any Department data, analysis, reports, or dashboards intended for external entities must be reviewed and approved by the staff member's supervisor and the DPI administrator before release.
 - b. The identity and privacy of persons served must be protected in all reporting, with redaction of individual identifiers and application of sample-size suppression procedures.
 2. Internal Reports
 - a. All internal data reports, dashboards, surveys, and tracking processes must be developed in collaboration with the relevant division, DPI, and IT to ensure accurate methodology, clear labeling, data notes, interpretation, and data quality.

- E. **Sample Size and Confidentiality**
 - 1. To preserve confidentiality and ensure statistical validity, the Department applies the following data suppression rules:
 - a. Any sample size of fewer than six must be suppressed, whether displayed as counts, percentages, or rates.
 - b. Based on the nature of the data, DPI may modify suppression thresholds.